

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

|                  |   |                         |
|------------------|---|-------------------------|
| VITA M. FORGIONE | : | CHAPTER 13              |
| Debtor           | : | CASE NO. 5-18-02460-JJT |

**DEBTOR'S ANSWER TO THE MOTION OF  
FOR RELIEF FROM THE AUTOMATIC STAY UNDER §362**

Debtor, Vita M. Forgione, through her undersigned counsel, hereby responds to the Motion for Relief from the Automatic Stay filed by Reverse Mortgage Solutions, Inc. as follows:

1. Admitted.
2. Denied. Strict proof of the averments are required at the time of trial.
3. Denied. Strict proof of the averments are required at the time of trial.
4. Denied. Strict proof of the averments are required at the time of trial.
5. Denied. Strict proof of the averments are required at the time of trial.
6. Denied. Strict proof of the averments are required at the time of trial.
7. Denied. Strict proof of the averments are required at the time of trial.
8. Denied. Strict proof of the averments are required at the time of trial.
9. Denied. Strict proof of the averments are required at the time of trial.
10. Denied. Strict proof of the averments are required at the time of trial.
11. Denied. Strict proof of the averments are required at the time of trial.
12. Denied. Strict proof of the averments are required at the time of trial.
13. Denied. Strict proof of the averments are required at the time of trial.
14. Denied. Strict proof of the averments are required at the time of trial.

**WHEREFORE**, the Debtor respectfully requests that this Honorable Court enter an Order denying the Relief requested by Reverse Mortgage Solutions, Inc. and for such other and further relief is just and appropriate.

Respectfully submitted,

**CONWAY LAW OFFICES, P. C.**

/s/ Mark J. Conway  
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Attorney for Debtor

DATED: December 20, 2018

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FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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| VITA M. FORGIONE<br>Debtor | :<br>:<br>: | CHAPTER 13<br><br>CASE NO. 5-18-02460-JJT |
|----------------------------|-------------|---|

**CERTIFICATE OF SERVICE**

I, Amy L. Marta, Paralegal hereby certify that I caused a true and correct copy of the foregoing Answer to the Motion for Relief From Automatic Stay Under §362 to be served via e-mail to the following:

Charles J. DeHart, III  
Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
[dehartstaff@pamd13trustee.com](mailto:dehartstaff@pamd13trustee.com)

Kevin M. Buttery, Esquire  
Robertson, Anschutz & Schneid, P.I.  
6409 Congress Avenue, Ste. 100  
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**CONWAY LAW OFFICES, P.C.**

/s/ Amy L. Marta  
\_\_\_\_\_  
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Phone (570) 343-5350  
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DATED: December 20, 2018